



Seth Scott <seth.d.scott@gmail.com>

Subpoena directed to Ben Smith

5 messages

Kristopher Madsen <Kristopher.Madsen@stuarttinley.com>

Thu, Jul 20, 2017 at 3:12 PM

To: "mcs@jaburgwilk.com" <mcs@jaburgwilk.com>

Cc: Kristopher Madsen <Kristopher.Madsen@stuarttinley.com>, Robert Livingston <Robert.Livingston@stuarttinley.com>, "ahouchens@shg-law.com" <ahouchens@shg-law.com>, "rsmith@shg-law.com" <rsmith@shg-law.com>, "seth.d.scott@gmail.com" <seth.d.scott@gmail.com>

Maria:

I have received another inquiry from Aaron Houchens relative to the subpoena that was served on Ben Smith a number of months ago. As you might recall, we have not responded to that because we are awaiting your input as to what you believe we can provide. Ultimately, I think we need to identify the items you are going to object to, so that Mr. Houchens knows. If we cannot resolve what documents can be produced then we might need to get this in front of a judge.

I am copying Mr. Houchens and his colleagues in on this email as well so that hopefully a dialogue can begin.

I look forward to hearing from you.



Kristopher K. Madsen

Stuart Tinley Law Firm LLP

CenturyLink Building

310 W. Kanesville Blvd., 2nd Floor

P. O. Box 398

Council Bluffs, IA 51502

Telephone: [712.322.4033](tel:712.322.4033)

Fax: [712.322.6243](tel:712.322.6243)

Direct Email: madsen.kristopher@stuarttinley.com

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Maria Crimi Speth <mcs@jaburgwilk.com>

Fri, Jul 21, 2017 at 2:53 PM

To: Kristopher Madsen <Kristopher.Madsen@stuarttinley.com>

Cc: Robert Livingston <Robert.Livingston@stuarttinley.com>, "ahouchens@shg-law.com" <ahouchens@shg-law.com>, "rsmith@shg-law.com" <rsmith@shg-law.com>, "seth.d.scott@gmail.com" <seth.d.scott@gmail.com>

Kris:

I thought that I did that. Let me check.



602.248.1089
JABURG | WILK
Attorneys at Law



MARIA CRIMI SPETH | Shareholder |

From: Kathy Mark [mailto:Kathy.Mark@stuarttinley.com] **On Behalf Of** Kristopher Madsen

Sent: Thursday, July 20, 2017 12:13 PM

To: Maria Crimi Speth

Cc: Kristopher Madsen; Robert Livingston; ahouchens@shg-law.com; rsmith@shg-law.com; seth.d.scott@gmail.com

Subject: Subpoena directed to Ben Smith

[Quoted text hidden]

2 attachments



image002.png
7K



image004.jpg
3K

Maria Crimi Speth <mcs@jaburgwilk.com>

Sat, Jul 22, 2017 at 7:27 PM

To: Kristopher Madsen <Kristopher.Madsen@stuarttinley.com>

Cc: Robert Livingston <Robert.Livingston@stuarttinley.com>, "ahouchens@shg-law.com" <ahouchens@shg-law.com>, "rsmith@shg-law.com" <rsmith@shg-law.com>, "seth.d.scott@gmail.com" <seth.d.scott@gmail.com>

Kris and Rob:

Pursuant to the settlement agreement, I am attaching a list of the objections that Xcentric will make to the subpoena that Stuart Tinley received from John Pitman. Once you let me know whether you have any documents responsive to category 7 and 17, Xcentric's counsel will prepare a formal objection letter to counsel for Mr. Pitman. Pursuant to our agreement, we request that you withhold the items objected to pending the resolution of our objections. Please let me know if you have any questions.



MARIA CRIMI SPETH | Shareholder |

602.248.1089

JABURG | WILK
Attorneys at Law

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Subject: Subpoena directed to Ben Smith

Maria:

[Quoted text hidden]

3 attachments



image002.png
7K



image004.jpg
3K



Pitman subpoena.DOCX
22K

Aaron Houchens <ahouchens@shg-law.com>

Sun, Jul 23, 2017 at 3:37 PM

To: Maria Crimi Speth <mcs@jaburgwilk.com>, Kristopher Madsen <Kristopher.Madsen@stuarttinley.com>

Cc: Robert Livingston <Robert.Livingston@stuarttinley.com>, rsmith@shg-law.com, seth.d.scott@gmail.com

Maria/Kris,

I see there a number of category of documents to which there is no objection. Can you agree to produce responsive documents to the requests to which there are no objections now?

Thanks,

Aaron

From: Maria Crimi Speth [mailto:mcs@jaburgwilk.com]
Sent: Saturday, July 22, 2017 7:28 PM
To: 'Kristopher Madsen' <Kristopher.Madsen@stuarttinley.com>
Cc: Robert Livingston <Robert.Livingston@stuarttinley.com>; ahouchens@shg-law.com; rsmith@shg-law.com; seth.d.scott@gmail.com
Subject: RE: Subpoena directed to Ben Smith

[Quoted text hidden]



Virus-free. www.avg.com

2 attachments



image002.png
7K



image004.jpg
3K

Aaron Houchens <ahouchens@shg-law.com>
To: Seth Scott <seth.d.scott@gmail.com>

Wed, Aug 2, 2017 at 2:01 PM

Sent from my iPhone

Begin forwarded message:

From: Maria Crimi Speth <mcs@jaburgwilk.com>
Date: July 22, 2017 at 7:27:44 PM EDT
To: 'Kristopher Madsen' <Kristopher.Madsen@stuarttinley.com>
Cc: Robert Livingston <Robert.Livingston@stuarttinley.com>, "ahouchens@shg-law.com" <ahouchens@shg-law.com>, "rsmith@shg-law.com" <rsmith@shg-law.com>, "seth.d.scott@gmail.com" <seth.d.scott@gmail.com>
Subject: RE: Subpoena directed to Ben Smith

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MARIA CRIMI SPETH | Shareholder | [602.248.1089](tel:602.248.1089)

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5 attachments

 **image001.jpg**
1K

 **image009.jpg**
1K

JABURG | WILK **image010.png**
Attorneys at Law 8K

 **STUART
TINLEY** **image008.png**
Law Firm LLP 23K

 **Pitman subpoena.DOCX**
22K